Case 1:19-cr-00374-JMF Document 270 Filed 01/18/22 Page 1 of 1



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

January 18, 2022

BY ECF

The Honorable Jesse M. Furman United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Michael Avenatti, 19 Cr. 374 (JMF)

Dear Judge Furman:

The Government writes respectfully in response to the Court's draft juror questionnaire (Dkt. No. 258). The Government respectfully suggests the inclusion of two names on the list of individuals in question number 24: Shamel Medrano and Jeremy Rosenman. In light of the Court's ruling on the motion to preclude the defendant's expert (Dkt. No. 238), the Government also suggests the removal of Donald Vilfer's name from that list. The Government has no other suggestions or objections to the Court's proposal.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By:

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cc: Robert M. Baum, Esq. (by ECF)
Andrew J. Dalack, Esq. (by ECF)
Tamara L. Giwa, Esq. (by ECF)